

EXHIBIT 14
FILED UNDER SEAL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

STATE OF TEXAS, et al.,

Plaintiffs,

Civil Action No.
4:20-cv-00957-SDJ

v.

GOOGLE LLC,

Defendant.

* * * * *

TRANSCRIPT OF THE VIDEOTAPED 30(B)(6) DEPOSITION:

STATE OF LOUISIANA

By and through:

PATRICK MICHAEL VOELKER

Friday, May 3, 2024

9:22 a.m. (CST)

Reported by:

YOLANDA J. PENA, Certified

Court Reporter No. 2017002

in and for the State of

Louisiana

Job No. CS6670337

A P P E A R A N C E S

FOR THE PLAINTIFF STATES TEXAS, IDAHO, INDIANA,
MISSISSIPPI, NORTH DAKOTA, SOUTH CAROLINA,
SOUTH DAKOTA, AND LOUISIANA:

THE LANIER LAW FIRM

(BY: RYAN D. ELLIS, ESQ.)

(BY: ALEX HENTHORN, ESQ.) [VIA ZOOM]

10940 WEST SAM HOUSTON PKWY. NORTH, SUITE 100

HOUSTON, TEXAS 77064

(713) 659-5200

ryan.ellis@lanierlawfirm.com

FOR THE PLAINTIFF STATE OF LOUISIANA:

THE DUGAN LAW FIRM

(BY: DAVID SCALIA, ESQ.)

365 CANAL STREET, SUITE 100

NEW ORLEANS, LOUISIANA 70130

(504) 648-0180

dscaliala@dugan-lawfirm.com

- AND -

LOUISIANA OFFICE OF THE ATTORNEY GENERAL

(BY: WILLIAM ROGERS, ESQ.)

1885 N. THIRD STREET, 3RD FLOOR

BATON ROUGE, LOUISIANA 70802

(225) 326-6705

rogersw@ag.louisiana.gov

FOR THE DEFENDANT GOOGLE LLC:

FRESHFIELDS BRUCKHAUS DERINGER

(BY: JEANNETTE BAYOUMI, ESQ.)

(BY: GAYLE R. KLEIN, ESQ.)

(BY: GABRIELLE SMALL, ESQ.) [VIA ZOOM]

3 WORLD TRADE CENTER

175 GREENWICH STREET

NEW YORK, NEW YORK 10007

(212) 230-4645

jeannette.beyoumi@freshfields.com

gayle.klein@freshfields.com

gabrielle.small@freshfields.com

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ALSO PRESENT:

ALBERT BONGARD, VIDEOGRAPHER

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S T I P U L A T I O N

IT IS STIPULATED AND AGREED by and among the parties that this deposition is hereby being taken pursuant to the Federal Rules of Civil Procedure.

All formalities, excluding the reading and signing of the transcript by the witness, are hereby waived.

All objections, except as to the form of the question and responsiveness of the answer, are considered reserved until trial or other use of the deposition.

1 complaint.

2 Q. So as you sit here today as the corporate
3 representative for the State of Louisiana, you're
4 unaware of any unique facts to Louisiana; is that
5 correct?

6 MR. ELLIS: Objection; form.

7 A. I guess as I sit here today, I'm unaware of
8 anything beyond what I just mentioned and had referred
9 to in response to a couple of your questions.

10 BY MS. BAYOUMI:

11 Q. What actions did Louisiana take to comply with
12 its discovery obligations?

13 MR. ELLIS: Objection; form.

14 A. It has, you know, to my knowledge and
15 understanding, produced that which would have been
16 responsive to y'all's request in a timely manner within
17 the deadline that has been set in this case.

18 BY MS. BAYOUMI:

19 Q. Did Louisiana institute a document hold notice
20 related to the litigation?

21 A. Not that I'm aware of. However, if this is
22 worth any, you know, quantifying here, I was not the
23 original attorney that signed onto this case. I had
24 come on in a later capacity.

25 Q. Who was the original attorney?

1 A. It's an individual that's no longer with the
2 office. His name is Christopher Alderman.

3 Q. Was there anyone else who was around when
4 Louisiana signed onto this case?

5 A. If my memory serves, I believe he was the lone
6 signatory on behalf of Louisiana.

7 Q. And when did you come on as an attorney for
8 this case?

9 A. It would have been the end of last calendar
10 year, turn of this year -- end of 2023, beginning of
11 2024.

12 Q. And when you came on as an attorney, did you
13 implement a document hold?

14 A. I did not.

15 Q. Why not?

16 MR. ELLIS: Objection.

17 To the extent it reveals any privileged
18 information, instruct you not to answer, but
19 if you can answer, then answer it.

20 A. Yeah. I'm not sure I can answer. I think
21 that would be strategic to a sense, so.

22 BY MS. BAYOUMI:

23 Q. So whether or not -- strike that.

24 Before you signed onto the case, who was the
25 attorney that was working on this case?

REPORTER'S PAGE

I, YOLANDA J. PENA, Certified Court Reporter in and for the State of Louisiana, (CCR #2017002), Registered Professional Reporter (RPR #970346), the officer, as defined in Rule 28 of the Federal Rules of Civil Procedure and/or Article 1434(B) of the Louisiana Code of Civil Procedure, do hereby state on the record:

That due to the interaction in the spontaneous discourse of the proceeding, double dashes (--) have been used to indicate pauses, changes in thought, and/or talkovers; that same is the proper method for a transcription of proceedings, and that the double dashes (--) do not indicate that words or phrases have been left out of this transcript;

That any spelling of words and/or names which could not be verified through reference material have been denoted with the parenthetical "(phonetic)";

That the parenthetical "(sic)" is used to denote when a witness stated a word or phrase that appears odd or erroneous to show that it was quoted exactly as it stands.

A handwritten signature in blue ink, appearing to read 'Yolanda J. Pena', is written over the printed name.

YOLANDA PENA, CCR, RPR

REPORTER'S CERTIFICATE

I, YOLANDA J. PENA, Certified Court Reporter in and for the State of Louisiana, Registered Professional Reporter, and as the officer before whom this testimony was taken, do hereby certify that PATRICK MICHAEL VOELKER, after having been duly sworn by me upon authority of R.S. 37:2554, did testify as set forth in the foregoing 138 pages.

I further certify that said testimony was reported by me in the Stenotype reporting method, was prepared and transcribed by me or under my direction and supervision, and is a true and correct transcript to the best of my ability and understanding.

I further certify that the transcript has been prepared in compliance with transcript format guidelines required by statute or by rules of the board and that I have been informed about the complete arrangement, financial or otherwise, with the person or entity making arrangements for deposition services.

I further certify that I have acted in compliance with the prohibition on contractual relationships, as defined by Louisiana Code of Civil Procedure Article 1434, and in rules and advisory opinions of the board.

I further certify that I am not an attorney or counsel for any of the parties, that I am neither related to nor employed by any attorney or counsel connected with this action, and that I have no financial interest in the outcome of this matter.

This certificate is valid only for this transcript, accompanied by my digital signature or original signature and original raised seal on this page.

Prairieville, Louisiana, this 6th day of May, 2024.



YOLANDA J. PENA, CCR, RPR
CCR NO. 2017002, RPR NO. 907346